

G/712-1643

METROPOLITAN EDISON COMPANY

Subsidiary of General Public Utilities Corporation

Subject AUDIT OF THE USE OF RADIATION WORK PERMITS IN PERFORMING MAINTENANCE

Location TMI Nuclear Station
Middletown, Pa. 17057
Date July 23, 1974
GQM 0358

From MR. W. E. POTTS

To MR. L. L. LAWYER

Confirming our telephone conversation this date, an audit will be performed to determine the adequacy of the use of Radiation Work Permits in Maintenance.

The audit will be performed by E. W. Daniels. The references are Administration Procedure #1016 and Radiation Protection Manual.

The approved checklist for the audit is as follows:

Review the past four (4) weeks' Work Request forms and the health physics surveys to determine if RWP's are adequately being used to provide protection during maintenance.

William E. Potts
William E. Potts
Supervisor-Quality Control

WEP:ca

cc: File

*This is approved by [unclear]
1600 7/23/74*

*SM [unclear]
Asst. [unclear]*

606154

544-061

Bmm

METROPOLITAN EDISON COMPANY Subsidiary of General Public Utilities Corporation

Subject UNANNOUNCED AUDIT OF THE USE OF RADIATION
WORK PERMITS WHILE PERFORMING MAINTENANCE

Location Reading

To MR. R. M. KLINGAMAN

Date August 22, 1974
GQM 0409

The audit covered the following area:

- (1) Completed Work Request for the period 6/19 thru 7/23/74.

The audit was conducted to determine if adequate health physics protection is provided during the performance of maintenance.

References to conduct the Audit were:

- (1) Administrative Procedure 1016 - Implementation and Control of Station Maintenance and Modifications
- (2) Administrative Procedure 1003 - Radiation Protection Manual

The following personnel were contacted during the course of the audit:

- (1) Mr. Kenneth Beale
- (2) Mr. John McGarry
- (3) Mr. Donald Reppert

The following personnel attended the Post Audit Review:

- (1) Mr. Kenneth Beale
- (2) Mr. John McGarry
- (3) Mr. J. J. Colitz
- (4) Mr. W. E. Potts
- (5) Mr. E. W. Daniels

Approximately eighty (80) completed Work Requests were reviewed during the conduct of this audit. Eight (8) Work Requests had discrepancies in the use of the Radiation Work Permit. The use of the Radiation Work Permit is not clearly described by Administrative Procedure 1016 in that it does not clearly define the interface between the maintenance group and the health physics group.

544-062

August 22, 1974
GQM 0409

To provide a description of how the system works discussions were held with John McGarry, Kenneth Beale, and Don Reppert. The discussion indicated that the system informally works as follows:

The Supervisor of Maintenance or his designee marks the Work Request form to indicate that a Radiation Work Permit is required. This is in answer to the question "Does work require a Radiation Work Permit?" item 7 on page 1 of the Work Request form. If the answer to the question is yes the personnel who are assigned to perform the work are supposed to go to a Health Physics Foreman who will issue them a Radiation Work Permit. However, if a Radiation Work Permit is not really necessary block 13 of the form will be marked N/A.

In 72 out of 80 cases checked this is apparently working even though the system is not described in the procedure. However, eight (8) Work Requests (2330, 2342, 2407, 2423, 2433, 2518, 2580, and 2755) indicate N/A in block 13 of the Work Request form without a signature to indicate that the decision by the Supervisor of Maintenance was overridden only after a review by Health Physics personnel. Health Physics personnel do not believe they did review that decision in these cases. In fact, it appears that on several of the Work Requests the Shift Supervisor and/or Shift Foreman were making the decision that R.W.P.'s were not applicable. Finding number 1 was issued.

The original decision as to whether or not an R.W.P. is required is not made by personnel who have the latest information needed to determine this. Daily surveys are conducted by the Health Physics group. The Supervisor of Maintenance does not receive copies of these surveys and therefore his decision indicated in block 7 is not based on the most current information.

Health Physics personnel are the most logical ones to make this determination and I would therefore recommend a review of Admin. 1016 and possible revision to include this Health Physics review.

B.M. McCallum
L. L. LAWYER
Ext. 567

LLL:lw

cc: R. C. Arnold*
J. J. Colitz
J. G. Herbein
R. F. Jones*

File 20.1.2/Audit Folder 74-22

544-063

606196

METROPOLITAN EDISON COMPANY
AUDIT FINDING REPORT FORM

AUDIT NO. 74-22

FINDING 1 OF 1

DATE: July 25, 1974 FACILITY: TMI NUCLEAR STATION

SUBJECT: Review of completed Work Request Forms

FINDING: The Supervisor of Maintenance required a Radiation Work Permit for eight (8) Work Requests (2330, 2342, 2407, 2423, 2433, 2518, 2580, and 2755) prior to commencement of work. This requirement was overridden by other than the Health Physics group and an RWP was not issued.

DISPOSITION: (SEE ATTACHED SHEET)

(Circle one)

AGREEMENT/DISAGREEMENT, AS TO REPORTED FINDING AND DISPOSITION

COGNIZANT DEPT. HEAD: Joseph J. Colby

AUDIT TEAM LEADER: Paul W. Daniels Sr.

NOTIFIED: [Signature]

STATION SUPT. OR DEPT. MANAGER

FINDING CLOSED:

[Signature]
AUDIT ENGINEER

[Signature]
DATE

AUDIT NO. 74-22

FINDING 1 OF 1 (Cont'd)

DISPOSITION:

The Station Superintendent shall issue a memorandum requiring the Supervisor of Maintenance to consult the Health Physics Department on all Work Requests for work inside the controlled area to determine if an R.W.P. is required (item 7 on the Work Request form).

Once the Work Request form has been checked yes (indicating a R.W.P. is required) the work must be performed in accordance with an R.W.P. unless the Health Physics Department authorizes otherwise.

Anyone can request a review by the Health Physics Department of any negative determination.

The Station Superintendent's memorandum shall be issued by August 14, 1974.

All of the above will be clarified in the next revision to Administrative Procedure 1016.

544-065

Audit Finding Closeout

To: Manager-QQA

Audit 74-22 Finding 1 has been resolved to my satisfaction

by the action described in Letter _____

Memo _____

Report _____

This Form

Action taken:

*A memorandum was issued by the
Attorney General on 9-3-74.*

*Canon 1016 was revised to clarify
HP review of work requests. (Rev. 5 dated 11/4/74)
Page 23 - Step 7*

*This Rev. 5 of 1016 was sent to
Langer on 11-7-74 for his approval.*

This finding is considered closed

POOR ORIGINAL

cc: Supervisor, Quality Control

Submitted:

544-066

J. J. Collet
J-31-75

METROPOLITAN EDISON COMPANY

Subsidiary of General Public Utilities Corporation

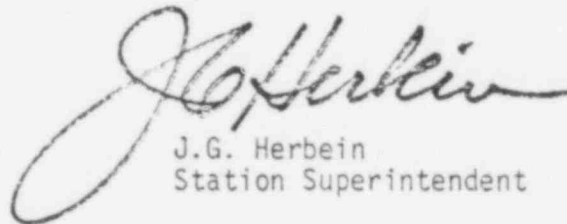
Subject RADIATION WORK PERMIT (RWP) Location TMI Nuclear Sta.
Date Middletown, Pa.
September 3, 1974

From MR. J.G. HERBEIN

To DEPARTMENT HEADS
SHIFT SUPERVISORS
LEAD ENGINEERS

The Supervisor of Maintenance shall consult the Health Physics Department on all Work Requests for work inside the controlled area to determine if a R.W.P. is required (item 7 on the Work Request form). Once the Work Request form has been checked yes (indicating a R.W.P. is required) the work must be performed in accordance with a R.W.P. unless the Health Physics Department authorizes otherwise.

Any supervisor can request a review by the Health Physics Department of any negative determination.


J.G. Herbein
Station Superintendent

JGH/dmn

544-067

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